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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
BHATIA SHIPPING AND AGENCIES PVT. LTD.	:	
	:	Docket No.: 1:07-cv-9346(BSJ)
Plaintiff,	:	
	:	
-against-	:	<u>NOTICE OF MOTION</u>
	:	
ALCOBEX METALS LTD.,	:	
	:	
Defendant.	:	
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PLEASE TAKE NOTICE that upon the Affirmation of James A. Saville, Jr., dated January 4, 2008, with the exhibits annexed thereto, the accompanying memorandum of law and upon all the proceedings heretofore had herein, defendant Alcobex Metals, Ltd. by and through its attorneys HILL RIVKINS & HAYDEN LLP, will move before the Honorable Barbara S. Jones, United States District Judge, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a time and place to be determined by the Court for an Order pursuant to Rule E of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure vacating the Order Directing the Clerk to Issue Process of Maritime Attachment and Garnishment

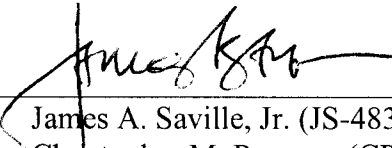
entered on October 25, 2007, and for such other and further relief as the court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the agreement of the parties, plaintiff's opposition to defendant's motion must be served and filed by January 18, 2008.

Dated: New York, New York
January 4, 2008

HILL RIVKINS & HAYDEN LLP
Attorneys for Defendant
Alcobex Metals Ltd.

By: _____


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